IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, et al.,

Plaintiffs,

V.

GREG ABBOTT, in his official capacity as Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO. 3:21-cv-00259-DCG-JES-JVB [Consolidated Action: Lead Case]

PRIVATE PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR THEIR RESPONSE TO LEGISLATORS' EMERGENCY MOTION TO STAY LEGISLATORS' DEPOSITIONS PENDING APPEAL

Pursuant to Local Rule CV-7(d)(3), Private Plaintiffs in these consolidated cases¹ respectfully move for leave to file a brief in excess of ten (10) pages—for up to fifteen (15) pages—in opposition to Legislators' Emergency Motion for Stay Legislators' Depositions Pending Appeal. Dkt. 283 ("Motion to Stay"). Private Plaintiffs' response is attached as Exhibit A.

Private Plaintiffs seek leave to exceed the page limit in order to explain the factual and legal bases of their opposition to Legislators' Motion to Stay. Granting this motion will not prejudice any party. Counsel for Legislators have stated that they do not oppose this motion.

CONCLUSION

¹ Private Plaintiffs are plaintiffs in each consolidated case, except for *United States v. Texas*, No. 3:21-cv-00299.

For the foregoing reasons, Private Plaintiffs respectfully request that the Court grant this unopposed motion.

DATED: May 19, 2022

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CERTIFICATE OF CONFERENCE

I hereby certify that, on May 19, 2022, counsel for LULAC Plaintiffs, on behalf of Private Plaintiffs, conferred with counsel for Legislators regarding the instant motion. Counsel for Legislators indicated that they do not oppose the motion.

/s/ Nina Perales	
Nina Perales	

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 19th day of May 2022.

<u>/s/ Nina Perales</u> Nina Perales